REMARKS/ARGUMENTS

Amendments were made to the specification to correct errors and to clarify the specification. No new matter has been added by any of the amendments to the specification.

Claims 1-20 are pending in the present application. With this amendment claims 1, 2, 3, 5, 9, 12, 14, and 18 have been amended. Reconsideration of the claims is respectfully requested.

I.   Objections to the Specification

The examiner objected to the specification because of informalities. This typographical error has been corrected. Therefore, Applicant believes this objection should be withdrawn.

II.   35 U.S.C. § 112, Second Paragraph

The examiner has rejected claims 3, 5, 9, and 14 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which Applicant regards as the invention. Specifically, the examiner stated that the term "express command" is unclear.

These claims have been amended to describe an instruction that was entered by an operator. Applicant believes the terms in these claims are clear. Therefore, Applicant believes this rejection has been overcome and should be withdrawn.

III.   35 U.S.C. § 103, Obviousness

The examiner has rejected claims 1, 4, 11-13, 15, 16, 18, and 19 under 35 U.S.C. § 103 as being unpatentable over U.S. Patent 5,410,707 issued to *Bell*. This rejection, as it might be applied to the claims as amended, is respectfully traversed.

Applicant has amended claim 1 to describe setting, by an operator, backup parameters that define how a backup operation will be executed. A backup operation is invoked using the backup parameters. Responsive to a given event, a determination is made as to whether a removable non-volatile memory module is connected to a first storage controller, and if the removable non-volatile memory module is connected to the first storage controller, the backup operation is executed. Some examples of support for these amendments can be found in the specification on page 6, lines 15-21, and page 7, lines 1-9.

The examiner cites *Bell* and states that it teaches all of the features of the claims but does not teach a processor storing configuration information from the memory to the removable non-volatile memory module.

Bell does not describe an operator setting backup parameters that define how a backup operation will be executed. *Bell* does not describe invoking a backup operation using the backup parameters. *Bell* does not describe responsive to a given event performing two steps that include (1) determining if a removable non-volatile memory module is connected to a first storage controller, and (2) responsive to the non-volatile memory module being connected to the first storage controller, executing the backup operation.

Bell does not suggest the features of Applicant's independent claims. *Bell* is not directed to backing up configuration information. *Bell* merely describes booting from the flash memory card instead of an internal ROM. *Bell* does not suggest storing or copying information to the flash memory card.

Although the examiner states that the information on the flash memory card must have come from some source, *Bell* does not suggest what this source might have been. Further, *Bell* does not suggest that the configuration information in the processor of *Bell* would have been the source.

Bell does not render Applicant's claims obvious because *Bell* does not describe, teach, or suggest setting, by an operator, backup parameters that define how a backup operation will be executed; invoking a backup operation using the backup parameters; and responsive to a given event: determining if a removable non-volatile memory module is connected to a first storage controller; and responsive to the removable non-volatile memory module being connected to the first storage controller, executing the backup operation

Independent claims 12 and 18 describe features that are similar to the features of claim 1 discussed above. Therefore, *Bell* does not render Applicant's claims 12 or 18 obvious for the reasons given above.

The other rejected claims depend from the independent claims discussed above and are patentable for the reasons given above.

The examiner has rejected claims 2 and 14 under 35 U.S.C. § 103 as being unpatentable over *Bell* and further in view of U.S. Patent 6,920,527 issued to *Cloutier*. This rejection, as it might be applied to the claims as amended, is respectfully traversed.

Claims 2 and 14 describe the backup operation being invoked by one of an expiration of a period of time and an instruction that was entered by the operator. Neither *Bell* nor *Cloutier* describes the combination of the features of the independent claims and the backup operation being invoked by an expiration of a period of time or an instruction that was entered by an operator.

The examiner has rejected claims 3, 5-10, and 20 under 35 U.S.C. § 103 as being unpatentable over *Bell* and further in view of U.S. Patent 6,266,724 issued to *Harari*. This rejection, as it might be applied to the claims as amended, is respectfully traversed.

Neither *Bell* nor *Harari*, either singly or in combination, describes, teaches, or suggests the combination of the features of the independent claims. Therefore, the combination of *Bell* and *Harari* does not describe, teach, or suggest the features of these dependent claims and the base independent claims.

The examiner has rejected claim 17 under 35 U.S.C. § 103 as being unpatentable over *Bell* and further in view of U.S. Patent 5,404,485 issued to *Ban*. This rejection, as it might be applied to the claims as amended, is respectfully traversed.

Claim 17 describes the flash memory module having a flash file system format for storing data. Claim 17 depends from claim 16 which depends from claim 12. Claim 12 describes backup parameters, set by an operator, that define how a backup operation will be executed; invoking means for invoking a backup operation using the backup parameters; and responsive to a given event: determining means for determining if a removable non-volatile memory module is electrically coupled to the processor; and responsive to the removable non-volatile memory module being electrically coupled to the processor, executing the backup operation.

Neither *Bell* nor *Ban*, either singly or in combination, describes, teaches, or suggests the features of claim 12 in combination with the flash memory module having a flash file system format for storing data. Therefore, the combination of *Bell* and *Ban* does not render Applicant's claim 17 obvious.
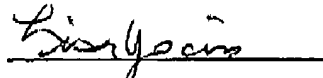
IV. Conclusion

It is respectfully urged that the subject application is patentable over the cited prior art and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 04.03.06

Respectfully submitted,

Lisa L.B. Yociss
Reg. No. 36,975
Yee & Associates, P.C.
P.O. Box 802333
Dallas, TX 75380
(972) 385-8777
Attorney for Applicant